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Counsel for Michael Goldberg, Trustee of the PFI Trust

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re:

PROFESSIONAL FINANCIAL INVESTORS,  
INC., *et al.*,

Debtors.

Case No. 20-30604

(Jointly Administered)

Chapter 11

**NOTICE OF RESCHEDULED HEARING  
AND UPDATED RESPONSE DEADLINE  
WITH RESPECT TO THIRD OMNIBUS  
OBJECTION TO CLAIMS**

Date: March 3, 2022  
Time: 10:00 a.m.  
Judge: Hon. Hannah L. Blumenstiel  
Place: Telephonic/Video Appearances  
Only

**TO THE HONORABLE HANNAH L. BLUMENSTIEL AND CLAIMANTS ON EXHIBIT 1  
HERETO FOR WHOM INDIVIDUALIZED NOTICES WERE SERVED PURSUANT TO  
PROCEDURES APPROVED BY THE COURT:**

On January 7, 2021, the PFI Trust filed its *Third Omnibus Objection to Claims (Non-Netted Investor Claims Netted to Zero)* [Docket No. 1072] (the "Omnibus Objection") with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the "Bankruptcy Court"). [A full copy of the Omnibus Objection may be obtained at no cost, as provided below.]

By the Omnibus Objection, the PFI Trust seeks to disallow one or more of your Proof(s) of Claim on the grounds that the Proof(s) of Claim is: *the filed Claim did not incorporate applicable netting principles applicable to Investor Restitution Claims and was superseded by the Investor Restitution Claim (the "UOA Claim") calculated by FTI and served on the Claimant in connection with the investor claims process approved by the Court and which concludes claimant is netted to \$0.00.*

**The PFI Trust has elected to extend the hearing date on the Objection from the originally-scheduled date of February 10, 2022, to March 3, 2022, at 10:30 a.m. (Pacific Time) (the “Omnibus Hearing”). As a result of the continuance of the Omnibus Hearing, your deadline to file a response has also been extended to February 17, 2022.**

The Omnibus Hearing will be conducted by videoconference. The courtroom will be closed. All parties who wish to appear at the Hearing should consult the Bankruptcy Court’s website at [www.canb.uscourts.gov](http://www.canb.uscourts.gov) for information about court operations during the COVID-19 pandemic. The Bankruptcy Court’s website provides information regarding how to arrange a telephonic or video appearance. If you have any questions regarding how to appear at a court hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court’s website.

If you **DO NOT oppose** the disallowance or reduction of your Proof(s) of Claim, then you do NOT need to file a written response to the Omnibus Objection and you do NOT need to appear at the Hearing.

If you **DO oppose** the disallowance or reduction of your Proof(s) of Claim, then you **MUST** file a response (a “Response”), in writing, with the Bankruptcy Court, and serve it on the counsel for the PFI Trust at the above-referenced addresses so as to be received by no later than **4:00 p.m. (Pacific Time) on February 17, 2022. The relief requested in the Omnibus Objection may be granted without a hearing if no opposition is timely filed and served in accordance with the Case Management Order.**

Any Response must, at a minimum, include the following: (i) a caption setting forth the name of the Bankruptcy Court, the name of the Debtor, the case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain the Omnibus Objection, including, without limitation, the specific factual and legal bases upon which you will reply in opposing the Omnibus Objection; (iv) a copy of any other documentation or other evidence of the Proof of Claim, to the extent not already included with the Proof of Claim, upon which you will rely in opposing the Omnibus Objection at the hearing; (v) a declaration under penalty of perjury of a person with personal knowledge of the relevant facts that support the Response; (vi) your name, address, telephone number, and/or the name, address, and telephone number of your attorney and/or designated representative to whom counsel for the Debtors should serve a reply to the Response, if any; and (vii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on your behalf, if any.

If the Bankruptcy Court does not disallow or reduce your Proof(s) of Claim, then the PFI Trust will still have the right to object to your Proof(s) of Claim on other grounds at a later date. You will receive a separate notice of any such objection.

Copies of the complete Omnibus Objection and other pleadings and documents identified herein can be viewed and/or obtained by: (i) free download from on the Debtors’ approved notice and claim agent’s website at [https:// www.donlinrecano.com/pfi](https://www.donlinrecano.com/pfi); (ii) accessing the Bankruptcy Court’s website at <http://www.canb.uscourts.gov> [PACER account required], or (iii) by mail (for free) by calling Donlin Recano at 1-877-283-0316 (Toll Free) and asking to have a complete copy of the

Omnibus Objection, including all Exhibits mailed to you, or by email at pfiinfo@donlinrecano.com requesting copies of the Omnibus Objection, including all Exhibits.

Dated: January 26, 2022

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ John D. Fiero

Debra I. Grassgreen

John D. Fiero

Cia H. Mackle

Attorneys for Michael I. Goldberg,  
Trustee of the PFI Trust

**EXHIBIT 1**

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